

1 KAEMPFER CROWELL
2 Robert McCoy, No. 9121
3 Brittney Lehtinen, No. 15949
4 1980 Festival Plaza Drive, Suite 650
5 Las Vegas, Nevada 89135
Telephone: (702) 792-7000
Facsimile: (702) 796-7181
Email: rmccoy@kcnvlaw.com
Email: blehtinen@kcnvlaw.com

6 PILLSBURY WINTHROP SHAW PITTMAN LLP
7 Bruce A. Ericson (*pro hac vice*)
8 Lee Brand (*pro hac vice*)
9 Four Embarcadero Center, 22nd Floor
San Francisco, California 94111
Email: bruce.ericson@pillsburylaw.com
Email: lee.brand@pillsburylaw.com

10 PILLSBURY WINTHROP SHAW PITTMAN LLP
11 David G. Keyko (*pro hac vice*)
12 31 West 52nd Street
New York, New York 10019
Email: david.keyko@pillsburylaw.com

13 Attorneys for Defendants BPM LLP
and Russell Burbank

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

17 SCOTT FREEMAN, M.D., as trustee for
the SCOTT MITCHELL FREEMAN
18 REVOCABLE TRUST, dated March 10,
2012, for itself and as assignee of
19 FERDINAND BELGA;

| Case No. 2:22-cv-01433-RFB-VCF

Consolidated with:

2:22-cv-01903-JCM-BNW

20 Plaintiff,

21 | VS.

22 STEPHEN HURST; NICO FORTE;
23 CERUVIA LIFESCIENCES f/k/a CH
TAC, LLC f/k/a SAVANT TAC, LLC;
24 CAREY TURNBULL; RUSSELL
BURBANK; BPM LLP; SAVANT

**BPM LLP AND RUSSELL
BURBANK'S UNOPPOSED
MOTION FOR LEAVE TO EXCEED
PAGE LIMIT ON REPLY IN
SUPPORT OF MOTION TO
DISMISS (ECF NO. 71)**

1 HWP, INC.; SAVANT HWP
2 HOLDINGS, LLC; and SAVANT
3 ADDICTION MEDICINE, LLC,

Defendants,

4 and

5 SAVANT ADDICTION MEDICINE,
6 LLC; SAVANT HWP HOLDINGS,
7 LLC; and SAVANT HWP, INC.,

Nominal Defendants.

8
9 Defendants Russell Burbank and BPM LLP (“BPM”) move to for an
10 order to exceed the page limit for its reply in support of its motion to dismiss (ECF
11 No. 71). While LR 7-3(b) normally restricts reply briefs to 12 pages, BPM requests
12 leave to file a reply brief with up to 15 pages of points and authorities.

13 There is good cause for this request as required by LR 7-3(c). On
14 February 15, 2023, Freeman filed a 42-page opposition to BPM’s motion to dismiss
15 (ECF No. 91) along with a motion for leave to exceed the normal 24-page limit (ECF
16 No. 96). In order for BPM to completely respond to this lengthy opposition, BPM
17 requests to exceed the normal 12-page limit by just a few pages.

18 Plaintiffs have consented to this request and do not oppose the page
19 limit increase.

20

21

22

23

24

1 KAEMPFER CROWELL
2

3 Robert McCoy, No. 9121
4 Brittney Lehtinen, No. 15949
5 1980 Festival Plaza Drive, Suite 650
6 Las Vegas, Nevada 89135
7

8 PILLSBURY WINTHROP
9 SHAW PITTMAN LLP
10 Bruce A. Ericson (*pro hac vice*)
11 Lee Brand (*pro hac vice*)
12 Four Embarcadero Center, 22nd Floor
13 San Francisco, California 94111
14

15 PILLSBURY WINTHROP
16 SHAW PITTMAN LLP
17 David G. Keyko (*pro hac vice*)
18 31 West 52nd Street
19 New York, New York 10019
20

21 Attorneys for Defendants BPM LLP
22 and Russell Burbank
23

24 **ORDER**

16 IT IS SO ORDERED.
17

18 RICHARD F. BOULWARE, II
19 UNITED STATES DISTRICT JUDGE
20

21 DATED this 18th day of May, 2023.
22

CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5(b), I certify that I am an employee of Kaempfer Crowell and I hereby certify that service of the **BPM LLP AND RUSSELL BURBANK'S UNOPPOSED MOTION FOR LEAVE TO EXCEED PAGE LIMIT ON REPLY IN SUPPORT OF MOTION TO DISMISS (ECF NO. 71)** was made on today's date by submitting electronically for filing and service with the United States District Court for the District of Nevada through the PACER Electronic Filing System to the addressee(s) shown below:

9 Daniel F. Polsenberg, No. 2376
10 J. Christopher Jorgensen, No. 5382
11 Joel D. Henriod, No. 8492
12 Abraham G. Smith, No. 13250
13 Lewis Roca Rothgerber Christie
3993 Howard Hughes Pkwy., Ste. 600
14 Las Vegas, Nevada 89169
dpolsenberg@lewisroca.com
cjorgensen@lewisroca.com
jhenriod@lewisroca.com
15 asmith@lewisroca.com

Brody R. Wight, No. 13615
Troutman Pepper Hamilton Sanders
8985 South Eastern Avenue, Ste. 200
Las Vegas, Nevada 89123
brody.wight@troutman.com

15 Attorneys for Plaintiff
Scott Freeman, M.D.

Attorney for Defendants Savant
Addiction Medicine LLC and Savant
HWP Holdings, LLC

17 Rew R. Goodenow, No. 3722
18 Michael R. Kealy, No. 971
19 Parsons Behle & Latimer
20 50 West Liberty Street, Ste. 750
21 Reno, Nevada 89501
22 rgoodenow@parsonsbehle.com
23 mkealy@parsonsbehle.com

Alex N. Vandiver (*pro hac vice*)
Parsons Behle & Latimer
201 South Main Street, Ste. 1800
Salt Lake City, Utah 84111
avandiver@parsonsbehle.com

21 Attorneys for Stephen Hurst, Savant
HWP Holdings, Inc. and Nico Forte

Attorneys for Stephen Hurst, Savant
HWP Holdings, Inc. and Nico Forte

1 Nicholas J. Santoro, No. 0532
2 Jason D. Smith, No. 9691
3 Holley Driggs
4 300 South Fourth Street, Ste. 1600
5 Las Vegas, Nevada 89101
nsantoro@nevadafirm.com
jsmith@nevadafirm.com

6 Gary D. Sesser (*pro hac vice*)
7 John M. Griem (*pro hac vice*)
8 Meredith B. Spelman (*pro hac vice*)
9 Carter Ledyard & Milburn LLP
10 28 Liberty Street, 41st Floor
11 New York, New York 10005
sesser@clm.com
griem@clm.com
spelman@clm.com

12 Attorneys for Defendants Ceruvia
13 Lifesciences LLC and Carey Turnbull

14 Attorneys for Defendants Ceruvia
15 Lifesciences LLC and Carey Turnbull

16 DATED May 15, 2023

17 
18 Desiree Endres
19 An employee of Kaempfer Crowell